



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

February 29, 2016

David R. Myers  
Shasta-Trinity National Forest Service  
3644 Avtech Parkway  
Redding, CA 96002

Subject: Draft Environmental Impact Statement for the Elk Late-Successional Reserve Enhancement Project, Shasta-Trinity National Forest, California. (CEQ# 20160008)

Dear Mr. Myers:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Elk Late-Successional Reserve Enhancement Project, Shasta-Trinity National Forest, California. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA recognizes the ecological significance of the Shasta-Trinity National Forest and the importance of improving forest health and sustainability. We support the Forest Service's goals of decreasing fuels and reintroducing fire on the landscape to reduce the risk of catastrophic fire, promote biodiversity, and restore natural ecological processes within the forest.

EPA has rated the DEIS and Preferred Alternative 1 as Lack of Objections (LO; see enclosed "Summary of Rating Definitions"). We support the best management practices and resource protection measures and monitoring included in the project design. The remainder of this letter provides recommendations for your consideration as you prepare the Final EIS.

In the discussion of compliance and consistency with California Assembly Bill 32 in Appendix H, the Forest Service states that the project "will have a negligible effect on climate change" because greenhouse gas emissions from the project "would mix readily into the global pool of GHG". EPA recommends avoiding comparisons of a project's GHG emissions to total global or U.S. GHG emissions, as this approach does not provide meaningful information for a project level analysis. Rather, we recommend the Forest Service further consider providing a frame of reference, such as applicable Federal, state, tribal or local goals for GHG emission reductions, and discuss whether the projected emissions levels would be consistent with such goals.

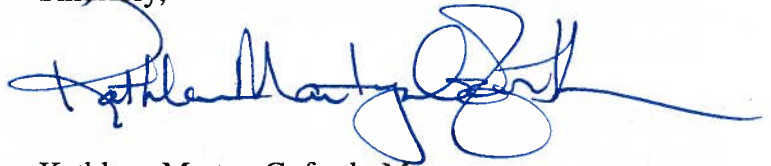
The DEIS includes a brief discussion of climate change, which notes that "trees retained or planted as part of this project will likely compose much of the forests in the project area over the next century" and that "[e]xisting species or genotypes may be poorly adapted to future climate conditions during all or various parts of their life cycles". It states that the reduction of stand density that would result from the proposed treatments "may increase the resilience of the stands to climate change". The Reforestation discussion on page A-33 notes that a mix of species would be selected for planting that would promote

diversity and include non-host trees for specific diseases. It is unclear to what extent resilience to climate change would also be a factor in selecting species for replanting. EPA suggests that the Final EIS include a discussion of the increased vulnerability of certain species under a reasonably anticipated climate change scenario, and any projected shift of forest species to new range elevations that may occur under such a scenario. We recommend that the FEIS disclose any additional climate change adaptation measures that may be appropriate, such as the selection of certain species for replanting of decommissioned roads and landings.

Lastly, we note that the project location may contain areas of potential importance historically, culturally, and/or spiritually to local tribes. We recognize that tribal consultation is an important component of the decision-making process associated with this project, and encourage the Forest Service to continue meaningful consultation, throughout the NEPA process, with all potentially affected tribal governments. We recommend that the results of consultations with tribal governments and with the Tribal Historic Preservation Office/State Historic Preservation Office be included in the FEIS.

Thank you for the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or [Munson.James@epa.gov](mailto:Munson.James@epa.gov).

Sincerely,



Kathleen Martyn Goforth, Manager  
Environmental Review Section

Enclosure: Summary of the EPA Rating System

Cc: Cindy Diaz, Natural Resource Planner, Shasta-Trinity National Forest

## **SUMMARY OF EPA RATING DEFINITIONS\***

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***"Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment